

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

TIFFANI M. SHAFFER,

Civil Action

Plaintiff,

No. 19-1481

v.

Judge Cercone

CRANBERRY TOWNSHIP,

**JURY TRIAL DEMANDED**

Defendant.

**JOINT MOTION FOR POST-DISCOVERY STATUS CONFERENCE**

The parties, by undersigned counsel, file this Joint Motion for Post-Discovery Status Conference, and in support state as follows.

1. Pursuant to this Court's Order dated August 28, 2020, discovery is scheduled to close on November 2, 2020.
2. The parties anticipate completing discovery by November 4, 2020.
3. The parties would like to schedule a post-discovery status conference with the Court to discuss scheduling of dispositive motions and pretrial statements, including a request that the parties file dispositive motions in advance of any pretrial work.

WHEREFORE, the parties respectfully request that the Court schedule a post-discovery status conference by telephone or Zoom on or after November 5, 2020.

Respectfully submitted,

**MARSHALL DENNEHEY  
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